

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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FRANCIS SANTIAGO,

Plaintiff,

v.

GMAC MORTGAGE GROUP, INC.,  
GMAC RESIDENTIAL HOLDING  
CORP., and GMAC MORTGAGE  
CORPORATION,

Defendants.

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Civil Action No. 02-4048

**JOINT MOTION FOR A PROTECTIVE ORDER**

Defendants GMAC Mortgage Group, Inc., GMAC Residential Holding Corp., and GMAC Mortgage Corporation (collectively, "Defendants"), and Plaintiff, Francis Santiago, move, pursuant to Fed. R. Civ. P. 26(c), to file a Protective Order, and in support of this motion state as follows:

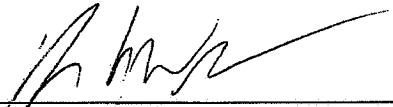
1. The parties anticipate the need for discovery involving the production and disclosure of confidential documents, data and other materials and information.
2. Plaintiff and Defendants agree that there are certain categories of information that may be discovered in this litigation that contain sensitive information of a non-public nature which should not be generally available to the public. Such information and documents should be subject to the Protective Order attached hereto as Exhibit A.
3. The parties submit that good cause exists for the entry of this Protective Order.

WHEREFORE, Defendants GMAC Mortgage Group, Inc., GMAC Residential Holding Corp.,

and GMAC Mortgage Corporation (collectively, "Defendants"), and Plaintiff, Francis Santiago, respectfully request that this Court enter the Protective Order attached as Exhibit A.

Dated: April 17, 2006


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